

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Yolanda Petty,

Plaintiff,

v.

National Credit Adjusters, LLC
c/o Corporation Service Company
2900 SW Wanamaker Drive, Suite 204
Topeka, KS 66614,

Defendants.

Case No.

COMPLAINT

Jury Demand Requested

Now comes Plaintiff, by and through her attorneys, and, for her Complaint, alleges as follows:

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §§1331, 1337, 1367; and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 4- Plaintiff is a resident of the State of the Illinois.
- 5- Defendant is a corporation with its principal office in the State of Kansas.
- 6- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 7- Defendant regularly attempts to collect, or attempts to collect, debts owed or due another.
- 8- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

FACTS COMMON TO ALL COUNTS

9- On or around October 10, 2013, Defendant telephoned Plaintiff's aunt (Aunt).

10- During this communication, Defendant disclosed the existence, nature, and/or amount of the Debt to Aunt.

11- During this communication, Defendant told Aunt that Plaintiff was in trouble for writing bad checks.

12- Defendant damaged Plaintiff.

13- Defendant violated the FDCPA.

COUNT I

14- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

15- Defendant violated 15 USC §1692e(7) by falsely implying that Plaintiff had committed a crime by not paying the debt.

COUNT II

16- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

17- Defendant violated 15 USC §1692e(10) by using false representation or deceptive means to collect a debt.

COUNT III

18- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

19- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, a debt.

COUNT IV

20- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

21- Defendant violated 15 USC § 1692b by disclosing to a third-party the existence, nature, and/or amount of the Debt.

JURY DEMAND

22- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

23- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorney's fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

By: /s/ Richard J. Meier

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